

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 5-15-03421-RNO
	:	
STEPHEN MATLIN,	:	CHAPTER 7
	:	
DEBTOR.	:	
	:	

**TRUSTEE’S OBJECTION TO DEBTOR’S MOTION  
TO COMPEL CHAPTER 7 TRUSTEE TO ABANDON REAL PROPERTY**

Mark J. Conway, Trustee (“Trustee”) of the Estate of Stephen Matlin (“Debtor”), through his undersigned counsel, hereby objects to the Debtor’s Motion to Compel Chapter 7 Trustee to Abandon Real Property, as he is currently investigating the value of real property known as 629 Lakeview Drive, Lake Ariel, Pennsylvania (“Property”), due to the fact that Debtor’s initial Schedule A filed on August 10, 2015, valued the Property at \$342,800.00 and indicated that it was completely encumbered in the sum of \$359,107.07; however, recent filings indicate that there is significant equity in the Property.

Debtor has now filed an Amended Schedule A/B valuing the Property at \$410,000.00, an Amended Schedule C claiming an exemption of \$22,975.00, and a Motion to Compel Chapter 7 Trustee to Abandon Real Property, on July 30, 2018, so that the Debtor could move forward with the sale of the Property for the gross sum of \$410,000.00.

Given the fact that there are over \$86,000.00 in claims on the Claims Register and it is now apparent that the Property is worth substantially more than initially indicated, it is the Trustee’s intention to sell the Property through the

bankruptcy estate, so that it may be administered for the benefit of administrative claims, unsecured priority claims and unsecured creditors.

**WHEREFORE**, the Trustee respectfully requests that this Court sustain the Trustee's Objection to Debtor's Motion to Compel Chapter 7 Trustee to Abandon Real Property and for all other relief that this Court deems just and appropriate.

**LAW OFFICES OF MARK J. CONWAY, P.C**

DATED: August 13, 2018

/s/ Mark J. Conway  
Mark J. Conway, Trustee  
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Dunmore, PA 18512  
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Counsel for Chapter 7 Trustee

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**CERTIFICATE OF SERVICE**

I, Constance Norvilas, Paralegal hereby certify that I have caused to be served this 13th day of August, 2018, a true and correct copy of the Trustee's Objection to Debtor's Motion to Compel Chapter 7 Trustee to Abandon Real Property using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail addresses:

U.S. Trustee  
228 Walnut Street  
Room 1190  
Harrisburg, PA 17101  
[ustpreion03.ha.ecf@usdoj.gov](mailto:ustpreion03.ha.ecf@usdoj.gov)

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Honesdale, PA 18431  
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**LAW OFFICES OF MARK J. CONWAY, P.C.**

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